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UNDER SEAL

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

September 2018 Grand Jury

UNITED STATES OF AMERICA,

12 SA CR No. 19-00016 JVS

13 Plaintiff,

I N D I C T M E N T

14 v.

15 DONGYUAN LI,  
16 Defendant.  
17  
18 [18 U.S.C. § 371: Conspiracy; 18  
19 U.S.C. § 1546(a): Visa Fraud; 18  
20 U.S.C. § 1343: Wire Fraud; 18  
U.S.C. § 1956(a)(2)(A):  
International Promotional Money  
Laundering; 18 U.S.C.  
§ 1028(a)(7): Unlawful Transfer,  
Possession, and Use of Means of  
Identification; 18 U.S.C.  
§ 1028A(a)(1): Aggravated Identity  
Theft; 18 U.S.C. § 2(a): Aiding  
and Abetting; 18 U.S.C. § 2(b):  
Causing an Act to Be Done]

22 The Grand Jury charges:

23 INTRODUCTORY ALLEGATIONS

24 At all times relevant to this Indictment:

25 1. A citizen of a foreign country who wished to enter the  
26 United States generally was required to first obtain a visa from the  
27 U.S. Government: either a nonimmigrant visa for temporary stay, or an  
28 immigrant visa for permanent residence. Visitor visas were

1 nonimmigrant visas for persons who wanted to enter the United States  
2 temporarily for business (visa category B-1), for tourism, for  
3 pleasure or visiting (category B-2), or for both purposes (B-1/B-2).

4       2. In order to apply for a tourist visa, an applicant was  
5 required to complete and submit a Nonimmigrant Visa Application and  
6 schedule an appointment for a visa interview. Generally, the visa  
7 interview would take place at a U.S. Embassy/Consulate in a foreign  
8 country.

9       3. Receiving a tourist visa from the U.S. Government was a  
10 privilege, not a right. In order to be granted a nonimmigrant visa  
11 to visit the United States, applicants were required to overcome the  
12 presumption in the U.S. Immigration and Nationality Act that all visa  
13 applicants are immigrants who intend to remain in the United States.

14       4. "Birth tourism" - also known as "maternity house" or  
15 "birthing house" - businesses were operations that housed pregnant  
16 foreign nationals in properties in the United States so that their  
17 children could be born in the United States and receive U.S.  
18 birthright citizenship. The operators helped the aliens fraudulently  
19 obtain visas to come to the United States, by filing visa  
20 applications that contained multiple false statements by  
21 misrepresenting the true intention of the visits.

22       5. Chinese birth tourism companies advertised the benefits of  
23 having children with birthright U.S. citizenship, such as to hedge  
24 against environmental, educational, and political problems in China.

25       6. In March 2015, federal law enforcement executed search  
26 warrants at approximately 35 suspected Chinese birth tourism  
27 locations throughout southern California, including in Orange, Los  
28 Angeles, and San Bernardino Counties.

1       7. These Introductory Allegations are alleged for all Counts  
2 in this Indictment as though set forth in their entirety.  
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1 COUNT ONE

2 [18 U.S.C. § 371]

3 A. OBJECTS OF THE CONSPIRACY

4 8. Beginning on a date unknown to the Grand Jury, but no later  
5 than in or around June 2013, and continuing to in or around March  
6 2015, in Orange and Los Angeles Counties, within the Central District  
7 of California, and elsewhere, including the People's Republic of  
8 China ("PRC"), defendant DONGYUAN LI ("LI"), together with others  
9 known and unknown to the Grand Jury, conspired and agreed with each  
10 other to knowingly and intentionally commit offenses against the  
11 United States, namely:

12 a. Immigration Fraud, in violation of Title 18, United  
13 States Code, Section 1546(a);

14 b. Wire Fraud, in violation of Title 18, United States  
15 Code, Section 1343;

16 c. International Promotional Money Laundering, in  
17 violation of Title 18, United States Code, Section 1956(a)(2)(A);

18 d. Unlawful Transfer, Possession, and Use of Means of  
19 Identification, in violation of Title 18, United States Code, Section  
20 1028(a)(7); and

21 e. Aggravated Identity Theft, in violation of Title 18,  
22 United States Code, Section 1028A(a)(1).

23 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
24 ACCOMPLISHED

25 9. The objects of the conspiracy were to be accomplished, in  
26 substance, as follows:

27 a. Defendant LI and others known and unknown to the Grand  
28 Jury would advertise their birth tourism business, You Win USA

1 Vacation Services Corporation ("You Win USA"), on the internet,  
2 through which they would promote the benefits of giving birth in the  
3 United States rather than in China, including identifying the United  
4 States as having:

5 i. The "most attractive nationality";

6 ii. Military, political, technological, and cultural  
7 strength, "with no sign of that fading";

8 iii. 13 years of free education from grade school to  
9 high school;

10 iv. Less pollution, noting, "The water and air in  
11 China are severely polluted, and food safety is a major concern";

12 v. An easier way for the whole family to immigrate  
13 to the United States: "After the child becomes an adult, parents can  
14 also immigrate";

15 vi. Retirement benefits: "after 10 years of paying  
16 taxes, enjoy life long retirement payments";

17 vii. High quality healthcare services; and

18 viii. "Priority for jobs in U.S. government, public  
19 companies, and large corporations. A lot of key positions such as  
20 government officials, defense, foreign affairs, high technology, and  
21 nuclear research labs are only restricted to U.S. citizens."

22 b. Defendant LI and Coconspirator-1, and others known and  
23 unknown to the Grand Jury, would claim to prospective birth tourism  
24 customers that they had served more than 500 birth tourism customers  
25 who successfully gave birth in the United States, thereby ensuring  
26 that their children received U.S. birthright citizenship.

27 c. Defendant LI and others known and unknown to the Grand  
28 Jury would provide a document entitled, "You Win USA Package Services

1 and Fees," which would claim that You Win USA had been servicing  
2 birth tourists for eight years and had "a 100-person team to provide  
3 service in China and the United States" that was in the process of  
4 growing into 200.

5 d. Defendant LI would use agents and employees in China  
6 to recruit pregnant Chinese nationals who wanted to come to the  
7 United States to give birth so their children would receive U.S.  
8 birthright citizenship.

9 e. Coconspirator-1 would register You Win USA with the  
10 California Secretary of State.

11 f. Defendant LI and Coconspirator-1 would communicate by  
12 email and WeChat with their employees, agents, and birth tourism  
13 customers in China.

14 g. Defendant LI and Coconspirator-1 would provide birth  
15 tourism services to all types of customers from China, including  
16 professionals such as doctors and lawyers and Chinese government  
17 employees and officials.

18 h. Coconspirator-1 and others known and unknown to the  
19 Grand Jury would possess a document entitled, "Strategies to Maximize  
20 the Chance of Entry," which discussed ways for Chinese birth tourists  
21 to slip through the U.S. visa and Customs processes when coming to  
22 the United States, including by recommending that, for best results,  
23 Chinese birth tourists should list on their visa applications that  
24 they intended to stay at the "5-star" hotel of "TRUMP INTERNATIONAL  
25 HOTEL WAIKIKI BEACH (Trump Hawaii Hotel)," in Honolulu, Hawaii.

26 i. Defendant LI and Coconspirator-1, together with others  
27 known and unknown to the Grand Jury, including their agents in China,  
28 would instruct the birth tourism customers to apply for their visa to

1 come to the United States early in their pregnancy so they would be  
2 able to conceal their pregnancy from U.S. officials.

3                   j. Defendant LI and Coconspirator-1, together with others  
4 known and unknown to the Grand Jury, including their agents in China,  
5 would cause to be filed visa applications for their Chinese customers  
6 with the U.S. Department of State, which contained false statements.

7                   k. You Win USA customers' visa applications would contain  
8 false statements as to the purpose of the visits, the length of stay  
9 in the United States, and the locations of their stay in the United  
10 States. Generally, You Win USA customers' visa applications would  
11 falsely state that the purpose of the trip to the United States was  
12 for tourism, the length of the stay was eight to 14 days, and the  
13 customers would be staying in Hawaii, New York, or Los Angeles, when  
14 in truth and in fact, those customers were coming to the United  
15 States to give birth, the length of their stay was three months, and  
16 they would be staying in Irvine, California.

17                  l. Defendant LI and Coconspirator-1, together with others  
18 known and unknown to the Grand Jury, including You Win USA's  
19 employees and agents in China, would coach their Chinese customers  
20 how to pass the U.S. Consulate interview in China, including by  
21 telling the customers to falsely say they were going to stay in the  
22 United States for only two weeks.

23                  m. Defendant LI and Coconspirator-1, together with others  
24 known and unknown to the Grand Jury, including You Win USA's  
25 employees and agents in China, would coach their Chinese birth  
26 tourism customers how to pass the U.S. Customs inspection at the port  
27 of entry by concealing their pregnancies.

28                  n. Defendant LI and Coconspirator-1, together with others

1 known and unknown to the Grand Jury, including You Win USA's  
2 employees and agents in China, would direct their Chinese birth  
3 tourism customers to book two flights: (a) the first flight from  
4 China to Hawaii, instead of from China to Los Angeles International  
5 Airport ("LAX"), because they believed that it would be easier to  
6 clear U.S. Customs through Hawaii; and (b) the second flight from  
7 Hawaii to LAX, which would then be considered a domestic flight with  
8 no U.S. Customs check.

9                   o. Defendant LI and Coconspirator-1 would lease  
10 approximately 20 apartments in Orange County to house You Win USA's  
11 pregnant Chinese customers.

12                   p. To lease those apartments, defendant LI and  
13 Coconspirator-1 would defraud the property owners by leasing the  
14 apartments in the names of people who were not going to be the actual  
15 occupants, as well as concealing from the property owners that  
16 defendant LI and Coconspirator-1 were running a business of housing  
17 multiple individuals on a short-term basis, and that they were  
18 operating an illegal international birth tourism scheme.

19                   q. Defendant LI and Coconspirator-1 would house their  
20 Chinese birth tourism customers at locations in Orange County, even  
21 though they knew that their customers' visas had been procured by  
22 fraud.

23                   r. Defendant LI and Coconspirator-1, and others known and  
24 unknown to the Grand Jury, would generally charge between \$40,000 and  
25 \$80,000 for each birth tourism customer.

26                   s. To deposit payments from their Chinese birth tourism  
27 customers, defendant LI and Coconspirator-1 opened and used many  
28 different bank accounts, both in the United States and China,

1 including bank accounts opened in the name of defendant LI's mother.

2                   t. To receive payments from their Chinese birth tourism  
3 customers, defendant LI and Coconspirator-1 would cause international  
4 transfers of funds from China to the United States, which in 2013  
5 totaled approximately \$1,500,000 to bank accounts in defendant LI's  
6 name, approximately \$1,000,000 to bank accounts in defendant LI's  
7 mother's name, and approximately \$500,000 to bank accounts in  
8 Coconspirator-1's name, and which in 2014 totaled approximately  
9 \$1,500,000 to bank accounts in defendant LI's name.

10                   u. To skirt China's outgoing currency transfer  
11 restrictions, defendant LI's Chinese employees and agents would use  
12 nominees to transfer money from China to the United States.

13                   v. Defendant LI and Coconspirator-1, and others known and  
14 unknown to the Grand Jury, would collect thousands of dollars in cash  
15 from their birth tourism customers after they arrived in the United  
16 States, which was in addition to the tens of thousands of dollars  
17 that the customers had already paid in China for You Win USA's birth  
18 tourism services.

19                   w. Defendant LI, Coconspirator-1, and Coconspirator-2  
20 would have approximately 10 employees in the United States to help  
21 them run their birth tourism scheme.

22                   x. During a federal undercover investigation of You Win  
23 USA, defendant LI would tell a female undercover agent pretending to  
24 be a Chinese national who wanted to come to the United States to give  
25 birth that defendant LI's company could help her do that.

26                   y. Defendant LI would instruct her birth tourism  
27 customers who needed to apply for a visa extension to fabricate  
28 financial documents to qualify for a visa extension and to submit

1 those documents to U.S. Immigration.

2                   z. In text messages with her birth tourism customers,  
3 defendant LI would refer to U.S. Immigration officers as "The  
4 foreigners."

5                   aa. Defendant LI, Coconspirator-1, and You Win USA's birth  
6 tourism customers from China would fail to pay all the costs of  
7 giving birth in the United States, including hospital, doctor, and  
8 other bills, which would then be referred to collection.

9                   bb. From in or around June 2013 to March 2015, defendant  
10 LI and You Win USA would have several hundred Chinese birth tourism  
11 customers who gave birth in the United States, whose children thus  
12 received birthright U.S. citizenship.

13 C. OVERT ACTS

14                   10. In furtherance of the conspiracy, and to accomplish its  
15 objects, on or about the following dates, defendant LI,  
16 Coconspirator-1, Coconspirator-2, and others known and unknown to the  
17 Grand Jury, committed various overt acts within the Central District  
18 of California, and elsewhere, including, but not limited to, the  
19 following:

20                   Overt Act No. 1: On or about May 28, 2013, defendant LI's  
21 husband, Co-Conspirator-2, submitted an application for an "O" visa  
22 premised upon being an "alien of extraordinary ability," which  
23 falsely claimed that he had co-authored two books and attached fake  
24 copies of those books, whereas in truth and in fact, he had not co-  
25 authored those two books.

26                   Overt Act No. 2: On or about September 17, 2013, defendant LI  
27 and Coconspirator-1 used the name and signature of Chinese national  
28 N.G. to lease an apartment for their birth tourism scheme, even

1 though that person was not even in the United States.

2       Overt Act No. 3: On or about October 3, 2013, defendant LI  
3 wrote a check for \$30,965 to pay for apartments that she and  
4 Coconspirator-1 were renting in Irvine, California, to house their  
5 birth tourism customers.

6       Overt Act No. 4: On or about November 4, 2013, defendant LI  
7 wrote a check for \$30,321.23 to pay for apartments that she and  
8 Coconspirator-1 were leasing in Irvine, California, to house their  
9 birth tourism customers.

10       Overt Act No. 5: In or around November 2013, defendant LI  
11 purchased her residence in Irvine, California, for approximately  
12 \$2,100,000, paid in full with no loan.

13       Overt Act No. 6: In or around November 2013, defendant LI  
14 purchased a new Mercedes-Benz for approximately \$118,000, paid in  
15 full with no loan.

16       Overt Act No. 7: On or about January 6, 2014, defendant LI  
17 wrote a check for \$30,965 to pay for apartments that she and  
18 Coconspirator-1 were renting in Irvine, California, to house their  
19 birth tourism customers.

20       Overt Act No. 8: On or about April 14, 2014, You Win USA  
21 customer W.L., a Chinese national, filed a visa application to come  
22 to the United States, where she falsely stated that she would be  
23 staying in the United States for only 12 days at the "Trump  
24 International Hotel" in Honolulu, Hawaii.

25       Overt Act No. 9: On or about May 30, 2014, You Win USA birth  
26 tourism customers H.X. and X.C. left the United States after X.C. had  
27 given birth in the United States, but they paid the hospital only the  
28 indigent rate of \$4,080 for hospital bills that actually exceeded

1 \$28,000, even though at that time, H.X. and X.C. had more than  
2 \$225,000 in a U.S. bank account, from which they had been making  
3 purchases at Rolex in Costa Mesa, California, and Louis Vuitton in  
4 Beverly Hills, California.

5 Overt Act No. 10: On or about June 20, 2014, defendant LI and  
6 Coconspirator-1 used the name and signature of Chinese national C.X.  
7 to lease an apartment to be used in their birth tourism scheme, even  
8 though that person was not even in the United States, and defendant  
9 LI and Coconspirator-1 attached an altered bank statement to that  
10 lease application.

11 Overt Act No. 11: On or about September 5, 2014, defendant LI  
12 and Coconspirator-1 used the name and signature of Chinese national  
13 D.L. to rent an apartment in D.L.'s name for their birth tourism  
14 scheme and attached an altered bank statement as proof of income to  
15 qualify for the lease.

16 Overt Act No. 12: On or about September 12, 2014, Chinese  
17 national Y.S.Y., who was the husband of You Win USA customer Y.Z.,  
18 filed a visa application to come to the United States, which listed  
19 his current job as "Partner Lawyer" of the law firm of Jiangtian &  
20 Gongcheng, in Beijing, China, and which contained false statements.

21 Overt Act No. 13: On or about September 29, 2014, You Win USA  
22 customer X.Y.L., a Chinese national, filed a visa application to come  
23 to the United States, which listed her current job as "Chief  
24 Physician" at the Henan Shangqiu Power Supply Company Staff Hospital,  
25 in Shangqiu, Henan, China, and which contained false statements.

26 Overt Act No. 14: On or about November 26, 2014, during an  
27 undercover operation where federal law enforcement had represented to  
28 Coconspirator-1 that they had a relative in China who wanted to come

1 to the United States to give birth, defendant LI's agents and  
2 employees uploaded a visa application in Shanghai, China, in the name  
3 of that undercover agent, which contained false information as to the  
4 purpose of her trip, location where she would be staying, and the  
5 duration of her trip to the United States.

6       Overt Act No. 15: On or about December 23, 2014, defendant LI  
7 left a voicemail message for a You Win USA customer to coach her  
8 through U.S. Customs, wherein defendant LI said: "The main thing is  
9 they look and see if you look obvious [pregnant]; can they see it?  
10 First thing is not to let them see it. Second thing is don't deny it  
11 if they can see it, and just say that you're still here for vacation  
12 and just show them the return flight ticket."

13       Overt Act No. 16: On or about December 25, 2014, defendant LI  
14 left a voicemail message for a You Win USA customer, wherein  
15 defendant LI said: "what I'm giving you here is a friend's itinerary.  
16 She's coming here on the same flight as yours. So you can look at  
17 the itinerary and then make modifications according to your return  
18 flight ticket. And then, you can hold onto it. If they can't tell  
19 that you're pregnant, then you can show this to them and they  
20 probably won't ask you anything additional. Once the sun comes up,  
21 I'll tell you the specifics, all right?"

22       Overt Act No. 17: On or about December 26, 2014, defendant LI  
23 wrote a WeChat text message to her husband, Coconspirator-2, about  
24 their birth tourism scheme, wherein defendant LI said: "After all,  
25 this is not legal!"

26       Overt Act No. 18: On or about December 30, 2014, defendant LI's  
27 husband, Coconspirator-2, sent defendant LI a WeChat text message  
28 telling her that he had just received a \$140,000 check from one of

1 their birth tourism customers.

2       Overt Act No. 19: From in or around January 2014 to the end of  
3 December 2014, defendant LI and Coconspirator-1 leased more than 30  
4 different apartments in Irvine, California, to house pregnant foreign  
5 nationals who had come to give birth in the United States by using  
6 visas that had been procured by fraud.

7       Overt Act No. 20: On or about January 10, 2015, defendant LI  
8 used the identity of her mother, P.H., to rent an apartment to use in  
9 the birth tourism scheme, even though her mother - who did not speak,  
10 read, or write English - did not know that defendant LI was using her  
11 identity to do that.

12       Overt Act No. 21: On or about January 16, 2015, defendant LI  
13 left a voicemail message for a You Win USA customer who needed to  
14 file an application for a visa extension, telling the customer that  
15 she would "transfer the money from my account to yours first, so you  
16 get a proof of funds," in order to trick U.S. Immigration that the  
17 customer had sufficient resources to qualify for a visa extension.

18       Overt Act No. 22: On or about January 16, 2015, defendant LI  
19 left another voicemail message to that You Win USA customer who  
20 needed to file an application for a visa extension: "no they just  
21 want a scanned copy. These foreigners, they won't look at whether  
22 yours are real or fake. They can't tell if it's real or fake. So  
23 you can scan a copy onto a computer and then make editing on the  
24 computer. Once you edit it, you can send it over. The foreigners,  
25 they can't - it's impossible that they will connect to the network in  
26 China. They can't tell if it's real or fake. They'll think it's  
27 real as long as you provide it to them, you know?"

28       Overt Act No. 23: On or about January 23, 2015, defendant LI

1 helped You Win USA customer X.Y.L. file an application to extend her  
2 visa, which application contained false statements.

3       Overt Act No. 24: On or about January 23, 2015, one of You Win  
4 USA's employees in China sent a WeChat text message to defendant LI,  
5 which stated that a new customer would be flying into the United  
6 States in February, and noted that: "This client is People's Congress  
7 Representative, the biggest real estate merchant in Xian. Client was  
8 kind enough to invite us to have a meal at the government owned  
9 Jianyi Club."

10       Overt Act No. 25: On or about January 25, 2015, one of You Win  
11 USA's employees in China sent a WeChat text message to defendant LI  
12 and her husband, Coconspirator-2, which asked for permission to issue  
13 a refund to one of their birth tourism customers: "Pregnant mom  
14 [H.Z.] had booked Gold Package. Now because the baby is a girl, her  
15 husband arranged abortion for her. Therefore request refund. . . .  
16 Please approve."

17       Overt Act No. 26: On or about February 23, 2015, defendant LI  
18 told a federal undercover agent posing as a pregnant Chinese national  
19 who wanted to come to the United States to give birth that: (a) "Our  
20 company in Beijing covers helping you with applying for the visa and  
21 training you, which includes the training to pass customs . . . the  
22 training to apply for the visa. We'll need to train you for the visa  
23 so you can go through the visa interview without problems"; (b) "We  
24 will tell you how to apply for the visa and what to say at the  
25 interview with the immigration officer"; and (c) "And then, after the  
26 visa interview is over, we'll also tell you how to go through customs  
27 successfully when you go through customs. We have training for all  
28 of that."

1           Overt Act No. 27: On or about March 3, 2015, when federal  
2 agents interviewed defendant LI's husband, Coconspirator-2, he told  
3 the agents that his You Win USA investment was "chump change," as he  
4 had more than \$10,000,000 in his bank accounts in China.

5           Overt Act No. 28: On or about March 3, 2015, defendant LI,  
6 Coconspirator-1, and Coconspirator-2 possessed business records of  
7 their birth tourism scheme.

8           Overt Act No. 29: On or about March 3, 2015, defendant LI  
9 maintained a copy of the "You Win USA Package Services and Fees"  
10 document used for her birth tourism customers, which provided that  
11 You Win USA would provide a refund to any customers if U.S. Customs  
12 did not admit them due to their pregnancies.

13           Overt Act No. 30: On or about March 5, 2015, two days after  
14 federal Department of Homeland Security and Internal Revenue Service  
15 - Criminal Investigation special agents had executed a federal search  
16 warrant at defendant LI's residence, her husband, Coconspirator-2,  
17 left for China and has not returned since.

18           Overt Act No. 31: On or about April 4, 2015, You Win USA  
19 customer L.J.Y. and her husband J.X., both Chinese nationals, fled to  
20 China in violation of federal Court Orders that required that they  
21 remain in the United States as material witnesses until released by  
22 the Court.

23           Overt Act No. 32: On or about April 14, 2015, after fleeing to  
24 China in violation of a federal Court Order, You Win USA customer  
25 J.X. wrote in a WeChat text message: "Anyway, I'm already home. U.S.  
26 can't do anything to me."

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1 COUNT TWO

2 [18 U.S.C. §§ 1546(a), 2]

3 11. On or about January 23, 2015, in Orange and Los Angeles  
4 Counties, within the Central District of California, and elsewhere,  
5 defendant DONGYUAN LI ("LI"), together with others known and unknown  
6 to the Grand Jury, each aiding and abetting the others, aided and  
7 abetted and caused X.Y.L., a Chinese national, to knowingly subscribe  
8 as true, under penalty of perjury under Title 28, United States Code,  
9 Section 1746, a false statement with respect to a material fact in an  
10 application, affidavit, and other documents required by the  
11 immigration laws and regulations prescribed thereunder, in that in an  
12 Application to Extend/Change Nonimmigrant Status, Chinese national  
13 X.Y.L. falsely stated that she had intended to travel to the United  
14 States as a tourist for two weeks of shopping, that she had \$96,800  
15 in her Bank of America account for the purpose of paying for her  
16 daily expenses and child birth, and that she had not done anything  
17 that violated the terms of her nonimmigrant status, which statements  
18 defendant LI and Chinese national X.Y.L. knew to be false, in that  
19 Chinese national X.Y.L. in fact had not intended to travel to the  
20 United States as a tourist for two weeks of shopping, did not have  
21 \$96,800 in her Bank of America bank account for the purpose of paying  
22 for her daily expenses and child birth, and had violated the terms of  
23 her nonimmigrant status.

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1 COUNTS THREE THROUGH THIRTEEN

2 [18 U.S.C. §§ 1343, 2]

3 A. SCHEME TO DEFRAUD

4 12. Beginning on a date unknown to the Grand Jury, but no later  
5 than in or around June 2013, and continuing until in or around March  
6 2015, in Orange and Los Angeles Counties, within the Central District  
7 of California, and elsewhere, defendant DONGYUAN LI ("LI"), together  
8 with others known and unknown to the Grand Jury, each aiding and  
9 abetting the others, knowingly and with intent to defraud, executed a  
10 scheme to obtain moneys, funds, assets, and other property owned by  
11 and in the custody and control of New Pacific Realty Corporation and  
12 others (collectively, "the property owners") by means of material  
13 false and fraudulent pretenses, representations, and promises, and  
14 the concealment of material facts.

15 B. THE MANNER AND MEANS OF THE FRAUDULENT SCHEME

16 13. The fraudulent scheme operated, in substance, in the  
17 following manner:

18 a. The Grand Jury realleges Section B of Count One of  
19 this Indictment as though set forth in its entirety here.

20 b. Defendant LI and Coconspirator-1 would lease  
21 apartments from the property owners to house their Chinese birth  
22 tourism customers.

23 c. To lease those properties, defendant LI and  
24 Coconspirator-1 would make false representations and promises to, and  
25 conceal material facts from, the property owners.

26 d. Defendant LI and Coconspirator-1 would pay the rent  
27 and other expenses for those properties by using proceeds from their  
28 fraudulent birth tourism scheme.

e. Defendant LI and Coconspirator-1 would make wire transfers for some of those expenditures, including by interstate wire communications.

f. Defendant LI would communicate by wire with others in China about her birth tourism scheme in the United States.

### C. USE OF THE WIRES

14. On or about the dates set forth below, in Orange and Los Angeles Counties, within the Central District of California, and elsewhere, defendant LI and others known and unknown to the Grand Jury, for the purpose of executing the above-described scheme to defraud, transmitted and caused the transmission of the following items by means of wire communication in interstate and foreign commerce:

COUNT	DATE	ITEM NUMBER
THREE	10/17/2014	\$1,708.59 payment to Southern California Edison from Coconspirator-1's Bank of America checking account ending in 9902 for electricity bills for multiple apartments used to house birth tourism customers in Irvine, California
FOUR	11/18/2014	WeChat text message from defendant LI to a You Win USA accountant in China with attached birth tourism customer list, asking the accountant to check whether the customers had all made full payment
FIVE	11/19/2014	\$1,724.84 payment to Southern California Edison from Coconspirator-1's Bank of America checking account ending in 9902 for electricity bills for multiple apartments used to house birth tourism customers in Irvine, California
SIX	01/05/2015	WeChat text message from defendant LI to a You Win USA accountant in China, wherein defendant LI tells the accountant that one of her customers gave her \$20,000 cash
SEVEN	01/08/2015	WeChat text message from defendant LI to a You Win USA accountant in China, wherein defendant LI tells the accountant that she just checked and had not yet received an incoming wire transfer from China

COUNT	DATE	ITEM NUMBER
EIGHT	01/15/2015	WeChat text message from a You Win USA accountant in China to defendant LI, wherein the accountant notifies defendant LI that they had just received a payment of approximately \$18,000 from Chinese birth tourism customer D.L.
NINE	01/16/2015	WeChat text message from defendant LI to one of her customers whom defendant LI was directing to create fake documents to submit to U.S. Immigration, wherein defendant LI refers to U.S. Immigration officers as "The foreigners"
TEN	01/25/2015	WeChat text message from a You Win USA employee in China to defendant LI, wherein the employee asks permission from defendant LI to issue a refund to a birth tourism customer who cancelled coming to the United States because her husband found out she was having a girl and had her undergo an abortion
ELEVEN	01/29/2015	WeChat text message from a You Win USA accountant in China to defendant LI, wherein the accountant asks defendant LI to check for a \$100,000 wire transfer from China that had just been sent to defendant LI
TWELVE	02/06/2015	\$1,221.99 payment to Southern California Edison from defendant LI's Bank of America checking account ending in 2717 for electricity bills for 18 apartments used to house birth tourism customers in Irvine, California
THIRTEEN	03/01/2015	WeChat text message from defendant LI to a You Win USA accountant in China, wherein defendant LI asks the accountant to wire transfer \$100,000 to defendant LI to use to pay for the apartments that were being used to house the birth tourism customers

## 1 COUNTS FOURTEEN THROUGH TWENTY-TWO

2 [18 U.S.C. §§ 1956(a)(2)(A), 2]

3 15. On or about the dates below, in Orange and Los Angeles  
 4 Counties, within the Central District of California, and elsewhere,  
 5 defendant DONGYUAN LI ("LI"), together with others known and unknown  
 6 to the Grand Jury, each aiding and abetting the other, knowingly  
 7 transported, transmitted, and transferred, and willfully caused the  
 8 transportation, transmission, and transfer of, and knowingly aided,  
 9 abetted, counseled, commanded, induced, and procured another person  
 10 to transport, transmit, and transfer, the funds listed below to a  
 11 place inside the United States from and through a place outside the  
 12 United States with the intent to promote the carrying on of specified  
 13 unlawful activity, specifically, immigration fraud, in violation of  
 14 Title 18, United States Code, Section 1546(a), and wire fraud, in  
 15 violation of Title 18, United States Code, Section 1343:

COUNT	DATE	INTERNATIONAL WIRE TRANSFER
FOURTEEN	10/21/2014	Wire transfer of \$49,000 from Bank of China, People's Republic of China ("PRC"), to Coconspirator-1's Bank of America checking account ending in 9902
FIFTEEN	10/28/2014	Wire transfer of \$49,000 from Bank of China, PRC, to Coconspirator-1's Bank of America checking account ending in 9902
SIXTEEN	10/29/2014	Wire transfer of \$49,000 from Bank of China, PRC, to Coconspirator-1's Bank of America checking account ending in 9902
SEVENTEEN	12/02/2014	Wire transfer of \$49,000 from Bank of China, PRC, to defendant LI's Bank of America savings account ending in 2930
EIGHTEEN	12/05/2014	Wire transfer of \$49,000 from Bank of China, PRC, to defendant LI's Bank of America savings account ending in 2930
NINETEEN	12/23/2014	Wire transfer of \$49,000 from Bank of China, PRC, to Coconspirator-1's Bank of America checking account ending in 9902
TWENTY	12/24/2014	Wire transfer of \$49,000 from Bank of China, PRC, to Coconspirator-1's Bank of America checking account ending in 9902

Count	Date	International Funds Transfer
TWENTY-ONE	01/15/2015	Wire transfer of \$49,000 from Bank of China, PRC, to defendant LI's mother's East West Bank savings account ending in 2457
TWENTY-TWO	01/22/2015	Wire transfer of \$49,000 from Bank of China, PRC, to defendant LI's mother's East West Bank savings account ending in 2457

1 COUNTS TWENTY-THREE THROUGH TWENTY-FIVE

2 [18 U.S.C. §§ 1028(a)(7), 2(a)]

3 16. On or about the following dates, in Orange County, within  
 4 the Central District of California, and elsewhere, defendant DONGYUAN  
 5 LI ("LI"), together with others known and unknown to the Grand Jury,  
 6 each aiding and abetting the other, knowingly transferred, possessed,  
 7 and used, without lawful authority, means of identification of  
 8 another person, namely, the names of the individuals listed below, at  
 9 the locations listed below, with the intent to commit, to aid and  
 10 abet the commission of, and in connection with the commission of, a  
 11 violation of Federal law, namely, Wire Fraud, in violation of Title  
 12 18, United States Code, Section 1343, with said transfer, possession,  
 13 and use affecting interstate and foreign commerce:

COUNT	DATE	DIMINICK	ITEM	DESCRIPTION
TWENTY-THREE	06/20/2014	C.X.	Unit 311 lease	The Carlyle at Colton Plaza Irvine, California
TWENTY-FOUR	09/05/2014	D.L.	Unit 418 lease	The Carlyle at Colton Plaza Irvine, California
TWENTY-FIVE	01/10/2015	P.H.	Unit 223 lease	The Carlyle at Colton Plaza Irvine, California

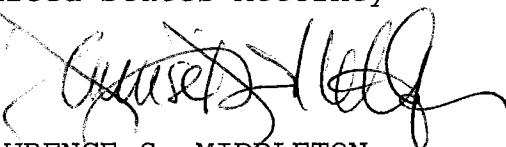
1 COUNTS TWENTY-SIX THROUGH TWENTY-EIGHT

2 [18 U.S.C. §§ 1028A(a)(1), 2(a)]

3 17. On or about the dates below, in Orange County, within the  
 4 Central District of California, defendant DONGYUAN LI ("LI"),  
 5 together with others known and unknown to the Grand Jury, each aiding  
 6 and abetting the others, knowingly transferred, possessed, and used,  
 7 without lawful authority, means of identification that defendant LI  
 8 knew belonged to another person, namely, the names of the individuals  
 9 listed below, during and in relation to the offense of Wire Fraud, a  
 10 felony violation of Title 18, United States Code, Section 1343, as  
 11 charged in the following counts of this Indictment:

COUNT	DATE	PROPERTY	IMPROBABLE OFFENSE
TWENTY-SIX	06/20/14	C.X.	COUNT THREE
TWENTY-SEVEN	09/05/14	D.L.	COUNT FIVE
TWENTY-EIGHT	01/10/15	P.H.	COUNT TWELVE

14 A TRUE BILL

15  
16  
17 Foreperson18 NICOLA T. HANNA  
United States Attorney19   
20 LAWRENCE S. MIDDLETON  
21 Assistant United States Attorney  
Chief, Criminal Division22 DENNISE D. WILLETT  
23 Assistant United States Attorney  
Chief, Santa Ana Branch Office24 DANIEL H. AHN  
25 Assistant United States Attorney  
Deputy Chief, Santa Ana Branch  
26 Office27 CHARLES E. PELL  
28 Assistant United States Attorney  
Santa Ana Branch Office